

Message

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Sent: 1/11/2017 9:40:46 PM
To: Steketee, John [steketee.john@epa.gov]
Subject: summary of Kipp conference call

Our December call with Madison Kipp did not go as well as planned. The purpose of the meeting was to have EPA's expert, Dr. Robert Burgess, discuss the technical aspect of using passive sampling to address the status of PCB migration to groundwater. The call started out with the owner, Tony Koblinski, wanting to discuss five separate items that he had drafted concerning Kipp. I explained that this call was only to address technical issues concerning the passive sampling approach EPA has researched. With that being said, the technical discussion began. Kipp has recently changed consultants to a company called TRC. TRC has Tom Soltzenbug on their staff, who has extensive PCB experience.

To summarize where we were at before the call, the problem with Kipp's current proposal for groundwater sampling is that the proposal relies on the inconsistency and anomalies associated with taking samples from their existing wells. The resultant protocol would require multiple downstream samples over prolonged periods of time to establish that PCBs have impacted groundwater and trigger a removal. Dave Petrovski, our Hydrogeologist, stated that the sampling protocol they proposed could **never** statistically reach the point that would trigger remediation. The element that is pushing this path for Kipp is that Kipp has already had some relatively high PCB hits at the well just below the highest soil contamination. Kipp has consistently dismissed these samples as a result of draw down (of PCBs) caused by the construction of the wells.

The discussion started with Dr. Burgess explaining the merits of using passive groundwater sampling at this site. Passive sampling allows the sampling medium to reach an equilibrium point that represents the actual groundwater concentration during the 30 day sampling period. Tom Soltzenberg basically fought against the use of passive sampling mainly because of the draw down issue that would not provide accurate groundwater levels. There was actually an attempt from Kipp at this point to table the passive sampling discussion and move on. Dave Petrovski responded with an excellent point, which was that if Kipp has been providing unreliable sampling data because of well construction, then they need to dig new wells. With our allocated conference time coming to an end we agreed to continue the discussion after the holidays.

Dave's suggestion for digging new wells, using techniques to eliminate draw down, is a reasonable approach. A key factor in this discussion is that the state has a relatively low PCB groundwater standard of .03 parts per billion that would require removal (or treatment) from Kipp. It appears that Kipp fears uncovering the true PCB groundwater concentration may put them above .03 parts per billion, either immediately or within a short period of time. We need to come to an agreement with Kipp on sampling to move forward on finalizing the technical requirements of the state settlement. At this point, it's uncertain how further discussions will progress.